

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:18-cr-167-19

v.

Hon. Paul L. Maloney
United States District Judge

TREBARIUS MCGEE,

Defendant.

**THIRD MOTION TO EXTEND DATE TO FILE
SUPPLEMENTAL BRIEF**

NOW COMES Trebarius McGee, by his attorney, Elizabeth A. LaCosse, and for this matter states:

On July 6, 2020, the Defendant filed his motion for appointment of counsel regarding filing a motion seeking relief under 18 U.S.C. § 3582(c)(1)(A) [ECF No. 1267; PageID.14579-14582].

On July 9, 2020, the Court filed an Order Appointing Counsel [ECF No.1268; PageID.14583] appointing counsel and directing counsel to file a motion pursuant to 18 U.S.C. § 3582(c)(1)(A) within 28 days of the date of the Court's order.

Upon Defendant's second request for an extension of time to file his supplemental brief, the Court filed an Order [ECF No. 1295; PageID.14703] directing counsel to file a supplemental brief by today – September 3, 2020.

Counsel seeks additional time to file the motion. Counsel had attempted to contact the BOP for weeks in order to schedule an attorney meeting with Mr. McGee. That meeting took place today and as a result of discussions with the Defendant, Counsel needs more time to review his desires before filing the motion. Therefore, while counsel understands there is an urgency in filing this supplemental brief, she believes that the time necessary to prepare a motion for relief under 18 U.S.C. § 3582(c)(1)(A) should take no longer than 14 days.

Counsel has discussed the anticipated filing of this motion with AUSA Katie Zell and has been advised that she does not oppose this request.

WHEREFORE, Mr. McGee moves this Honorable Court to extend the deadline to file his motion for relief under 18 U.S.C. § 3582(c)(1)(A) to September 17, 2020.

Respectfully submitted,

SHARON A. TUREK
Federal Public Defender

/s/ ELIZABETH A. LACOSSE
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Dated: September 3, 2020